

Rio Alto Water District

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JUN 29 1998

June 25, 1998

Mr. Lester Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

RE: Draft EIR/EIS ERPP - Cottonwood Creek

This response will refer to the following documents:

- (1) CALFED EIR/EIS Ecosystem Restoration Program Plan (ERPP) - Volume II.

Dear Mr. Snow:

The following comments regarding the Cottonwood Creek Vision are being made on behalf of the Rio Alto Water District:

1. VISION FOR THE ECOLOGICAL ZONE - GENERAL -

The CALFED Vision for the Cottonwood Creek Ecological Zone advocates a broad based elimination of so-called ecological stressors that include economy based industry/commercial venturers, land use activities and water diversions. The nature of these changes are complex and extensive yet CALFED documents tend to assume, without the benefit of specific supporting studies, that these proposed fixes will in fact be successful at rehabilitating the stream and ecological zone and restoring it to a somewhat pristine image.

2. VISIONS FOR UPPER AND LOWER COTTONWOOD CREEK -

The EIR-EIS documents suggest that the formation of a "Local Watershed Management Plan" and the creation of an associated "Watershed Conservancy" or Agency for the upper creek portion is highly desirable. Rio Alto Water District recommends that CALFED modify this suggestion in support of a local watershed agency that will address all of the Cottonwood Creek drainage area. Rio Alto Water District is aware that such a group already exists, namely the "Cottonwood Creek Watershed", a consortium of landowners, residents and business leaders that are approximately 50 in membership. It is our District's belief that this group will be addressing the concerns of the entire Cottonwood Creek Watershed with timely submittal to CALFED.

3. COTTONWOOD CREEK VISION SPECIFICS -

Rio Alto Water District would like CALFED staff to address the following specific issues regarding the Cottonwood Creek Vision:

- (a) In the Cottonwood Creek Vision of the ERPP, Volume II there is a reference to a CALFED vision that "Stream flows in Cottonwood Creek emulate the natural run off pattern with a late summer or early fall flow event".

What does this mean? Describe how the current seasonal flow patterns for Cottonwood Creek differ from what you believe will be a more natural flow event.

- (b) In the Cottonwood Creek Vision of the ERPP, Volume II there is discussion of managing instream gravel extraction and mining activities even to the point of relocating these activities to other areas outside the stream channel.

While Rio Alto agrees that gravel recruitment for the Sacramento River corridor is important, we wonder if relocation of such operations is feasible or environmentally compatible with creation of the desired watershed ecological zone. Have any potential relocation sites been identified or evaluated? If not, this needs to be done up-front.

- (c) The Cottonwood Creek vision goes on to discuss the "Natural flood plain and flood process" as currently being, in some manner, inhibited and not supportive of the CALFED restored image. It is advocated by CALFED that the stream be returned to an uncontrolled flooding process.

Those of us who have lived on or around Cottonwood Creek during winter storm flows know that the Cottonwood Creek drainage area is not inhibited during flood flows. It is Rio Alto Water District's belief that natural, uncontrolled flooding from the Cottonwood Creek Watershed is detrimental not only to local residents but also to effective environmental restoration efforts. It is our belief that most of those restoration processes identified in this vision would be hindered by uncontrolled flooding of the watershed. Reasonable control over meander and the flooding process could enhance restoration activities such as re-vegetation, scour, cleansing and transport. The installation of flood control and stream flow enhancement facilities like the Red Bank Project should be fully explored.


- (d) The CALFED Cottonwood Creek Vision discusses the maintenance of 20 to 50 CFS minimum streambed flow and the reduction of the up-stream use of tributary and stream waters.

It appears that CALFED advocates a reduction in use of waters that support Cottonwood Creek flow through a change in land use activities and/or a re-direction to other consumer sources. There is no description of these other consumer sources, if they exist, and whether they can be developed. Any suggested switch to groundwater becomes a two-edged sword that will require indepth studies and analysis. Ranching and general agricultural farming have been in existence in the Cottonwood-Bowman valley for decades and it may not be feasible to significantly change current land use patterns. CALFED staff must first determine how important a shift in current land use, if even feasible, is to the restoration processes of this vision. CALFED staff must also determine if the minimal stream flow levels are achievable and whether they will be successful in promoting the restoration program of this vision.

While Rio Alto Water District appreciates the CALFED staff effort in creating an ideal vision for Cottonwood Creek's watershed future, it is far easier to visualize a desired product than it is to produce it. Like the CALFED process itself, the Cottonwood Creek Watershed is an intricate, inter-mingled resource that overlaps many jurisdictions. Like many of the elements of the CALFED program, we are convinced that proper solutions can be obtained through indepth study, local control and local implementation.

Again, Rio Alto Water District looks forward to our continued involvement with and the ultimate success of the CAL FED Bay-Delta Program.

Sincerely,


Roger Sherrill, General Manger
Rio Alto Water District

RS/jo

cc: Rio Alto Water District Board of Directors
Senator Maurice Johannessen
Tehama County Flood Control and Water Conservation District
Board of Directors
Dan Keppen, Northern California Water Association
Bill Richardson, U.C. Coop.
Patrick Minturn, Shasta County
Vickie Newlin, Butte County
Ivar Amen, Cottonwood Creek Watershed

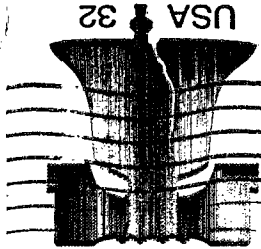
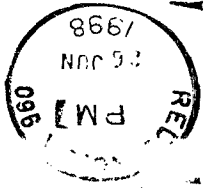
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Return Service Requested

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